

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE CRUDUP,)	
)	CASE NO.
Plaintiff,)	8:21CV0045
)	
v.)	
)	
THE CITY OF OMAHA,)	TAKEN ON BEHALF
)	OF THE
Defendant.)	PLAINTIFF

APPEARANCES:

Mr. Potso Mahlangeni-Byndon	For Plaintiff
Attorney at Law	
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Omaha, NE 68110	
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Ms. Michelle A. Peters	For Defendant
Attorney at Law	
CITY OF OMAHA LAW DEPARTMENT	
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DEPOSITION OF FIRE CHIEF DANIEL C. OLSEN,
taken at 10:01 a.m. on April 1, 2022, by Rachel
McMenamin, CSR, RPR, and General Notary Public in and
for the State of Nebraska, at 1819 Farnam Street,
Suite 804, Omaha, Nebraska.

CROSS - OLSEN (Peters)

1 unbecoming an incumbent of the particular office or
2 position held, including off-duty conduct, which
3 render reprimand, suspension, demotion, or discharge
4 necessary or desirable for the economical or
5 efficient conduct of business of the city or for the
6 best interest of the city government.

7 Q Okay. Do you know if the HR department
8 that investigated Crudup's claim, did they consider
9 this -- this CBA article?

10 A I do not know if they did.

11 Q Okay. Do you see how the hanging of
12 Firefighter Crudup's PPE from a flagpole by a white
13 firefighter could violate subsection (e)?

14 A I do not based on the findings in the
15 investigation.

16 Q And what about (h)?

17 A I do not based on the findings in the
18 investigation.

19 Q And what about (j)?

20 A I do not based on the findings in the
21 investigation.

22 Q Okay. And you're unsure if they
23 considered this --

24 A I do not know.

25 Q Okay. Okay. Lastly, what's the role of a

CROSS - OLSEN (Peters)

1 fire chief when a firefighter gets injured on duty?

2 A I receive a report --

3 Q Uh-huh.

4 A -- of occurrence --

5 Q Uh-huh.

6 A -- and that's the extent of my role for an
7 injured-on-duty employee, depending on the -- the
8 scope or nature of the injury. There is a unit
9 within the HR department --

10 Q Uh-huh.

11 A -- that deals with injured city
12 employees --

13 Q Uh-huh.

14 A -- and handles all of the work comp-type
15 functions, handles all those things.

16 Q Uh-huh. So that's the extent of your
17 role?

18 A That's the extent of my role --

19 Q Okay.

20 A -- yes. I receive a report of the injury,
21 and that's the extent of my role.

22 MR. BYNDON: Okay. Very well. Counsel?

23 CROSS-EXAMINATION

24 BY MS. PETERS:

25 Q Just a very few questions. Chief, you